

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

DESTINI VOGEL, as next of kin to)	
MATTHEW VOGEL, deceased,)	
)	
)	NO.: 1:24-cv-00108
Plaintiff,)	
)	
v.)	
)	
)	
CORECIVIC OF TENNESSEE, LLC,)	
)	
Defendant.)	

**AFFIDAVIT IN SUPPORT OF DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

STATE OF TENNESSEE

COUNTY OF MADISON

I, Nathan D. Tilly, after having first been duly sworn according to law hereby make oath
and affidavit as follows:

1. I am Counsel for the Defendant, CoreCivic of Tennessee, LLC, in the above-styled case,
and I have read and prepared the statements and facts set forth in the Motion for Extension
of Time filed in this case.
2. Additional time is needed to complete the investigation of the allegations contained in the
Plaintiff's Complaint in order to prepare an appropriate response by my client.
3. It is my belief that no prejudice will result to the Plaintiff as to the request for this extension
of time and this is the first request for said extension.

Further, Affiant saith not.


NATHAN D. TILLY

Sworn to and subscribed before me this 28th day of January, 2025.


NOTARY PUBLIC

My Commission Expires: 12/28/25



Respectfully submitted,

PENTECOST, GLENN & TILLY, PLLC

By: s/Nathan D. Tilly
Nathan D. Tilly (#31318)
Haynes T. Russell (#36923)
Attorneys for Defendant CoreCivic of
Tennessee
162 Murray Guard Drive, Suite B
Jackson, Tennessee 38305
(731) 668-5995 – Telephone
(731) 668-7163 – Facsimile
ntilly@pgtfirm.com
hrussell@pgtfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via the US District Court ECF system upon the following:

Benjamin K. Raybin
David J. Weissman
Raybin & Weissman, P.C.
424 Church Street, Ste. 2120
Nashville, TN 37219

on or before the filing date thereof.

DATE: This the 26th day of January, 2025.

By: s/Nathan D. Tilly
Nathan D. Tilly